

Exhibit D

Insufficiently Alleged Claims

1. Insufficiently alleged claims in (i) the administrative expense claims filed by the ERS Bondholder Groups [ECF No. 9285 in Case No. 17-3283 and ECF No. 707 in Case No. 17-3566; ECF No. 9294 in Case No. 17-3283 and ECF No. 710 in Case No. 17-3566]; (ii) the Fiscal's Agent's Joinder to the ERS Bondholder Groups' administrative expense motion. [ECF No. 9298 in Case No. 17-3283 and ECF No. 712 in Case No. 17-3566]; and (iii) the addenda to the proofs of claim filed by the ERS Bondholder Groups and Fiscal Agent [Claim Nos. 16777, 16775, 32004)]
 - a. Alter Ego
 - b. Subrogation
 - c. Avoidance
 - d. Breach of fiduciary duty
 - e. Breach of express and implied warranty
 - f. Fraudulent misrepresentation
 - g. Violations of the "United States Bankruptcy Code"
 - h. Violations of "various securities laws"
 - i. Equitable or constructive trust
 - j. Equitable subordination
 - k. Reimbursement
 - l. Contribution